

Clerk of the Court  
United States Bankruptcy Court  
District of Delaware  
824 North Market Street, 3rd Floor  
Wilmington, Delaware 19801

FILED  
2025 JUL 28 P 2:38  
CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

**PRO SE OBJECTION AND RESERVATION OF RIGHTS  
REGARDING CLAIM #11992 AND CLAIM #12816  
JOANN INC. BANKRUPTCY CASE NO. Case No. 25-10068 (CTG)**

**(Jointly Administered)**

Dear Honorable Court,

We, Paramount Home Collections Private Limited, respectfully submit this pro se objection and reservation of rights in response to the reclassification of our claims in the bankruptcy matter of Joann Inc., **Case No. 25-10068 (CTG) (Jointly Administered)**

We recently received information just today about some notice that our claim has been objected to in the Debtors' Eleventh Omnibus Objection (Docket No. 1319) on the basis that supporting evidence was insufficient to grant administrative priority under 11 U.S.C. § 503(b)(9). However, we have not been served with any formal notice, docket entry, or correspondence directly from the Debtors or their counsel.

Our Claim #11992, originally filed via CRG Financial, and our Claim #12816, filed independently, both relate to shipments of goods made to Joann Inc. prior to the bankruptcy filing on January 15, 2025. We had claimed:

- \$135,479.21 as Administrative Priority (503(b)(9))
- \$343,162.41 as General Unsecured

Upon further reconciliation and newly discovered internal shipping records, we believe the correct Administrative Priority portion should be furthermore added to \$175,537.36, with the remaining balance categorized as General Unsecured. That means a total of actually \$311,016.57 should be correct Administrative Priority Portion, with the remaining balance categorized as General Unsecured.

We understand that proof of delivery is required and are in the process of collecting detailed records, including Proof of Delivery (POD) confirmations. We respectfully request the Court to reserve our rights to supplement this objection with such documentation.

As a foreign creditor, we are handling this matter without U.S. legal representation. We are actively gathering shipment records, forwarder confirmations, and port arrival data to validate delivery to the Debtor's possession in the relevant period prior to the bankruptcy filing.

We affirm our intention to comply fully and provide the necessary documentation. This request is made in good faith to preserve our due process rights and respectfully request the Court's understanding and consideration.

Thank you for your attention.

We further request that the Court grant us a reasonable extension to submit complete evidence as we are a foreign creditor operating without U.S. legal counsel.

All correspondence should now be sent directly to us:

Paramount Home Collections Private Limited  
Attention: Mohammad Arbab Shamsi, Director  
36 Tavela Street, Akhtar Building  
Moradabad, Uttar Pradesh 244001, INDIA  
Email: [arbab@paramounthomecollections.com](mailto:arbab@paramounthomecollections.com)  
Phone: +91-9897682000

We thank the Court for its understanding and consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'Arbab' with a stylized flourish.

Mohammad Arbab Shamsi  
Director, Paramount Home Collections Pvt. Ltd.  
Dated: July 28, 2025